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APR 21 2006



MICHAEL K. JAMES, CLERK
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Attorneys for Arizona Department of Health Services and the Arizona State Hospital

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

CHARLES ARNOLD, MARICOPA
COUNTY PUBLIC FIDUCIARY, as guardian
and next friend on behalf of JOHN GOSS;
NANCY E. ELLISTON, as guardian,
conservator and next friend on behalf of
CLIFTON DORSETT and as next friend on
behalf of RICHARD SCHACHTERLE and
SUSAN SITKO; TERRY BURCH; and on
behalf of all others similarly situated,

Plaintiffs,

vs.

ARIZONA DEPARTMENT OF HEALTH
SERVICE, ARIZONA STATE HOSPITAL,
MARICOPA COUNTY BOARD OF
SUPERVISORS, and JANET
NAPOLITANO, Governor of Arizona.

Defendants.

Maricopa County

No. C-432355

STIPULATION RE: NETWORK PLAN

(Assigned to the Hon. Karen L. O'Connor)

Plaintiffs, the Governor and the Arizona Department of Health Services/Arizona State
Hospital entered into a Joint Stipulation to Partially Resolve Plaintiffs' Motion for
Noncompliance and Further Remedial Orders on November 28, 2005. The Stipulation requires

1 the Defendants to develop a network plan for the creation of additional service capacity to
2 provide independent living skills, housing support services, vocational/work supports and
3 substance abuse services for the priority class members at the five targeted sites. ¶3 Joint
4 Stipulation. The parties stipulate to the following terms for the development of the additional
5 service capacity.

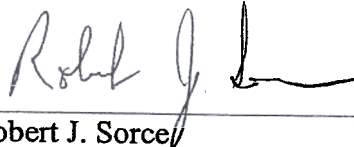
6 1. Defendants will provide independent living skills, housing support, vocational
7 work supports and substance abuse services to 300 additional priority classmembers for each of
8 these four service categories at the six targeted sites using new and existing providers.
9 Defendants' time period to complete this task begins at the time this Stipulation is approved by
10 the Court and ends on or before September 30, 2006.

11 2. Defendants will employ the following methodology to measure the provision of
12 services described in ¶ 1 above. During the months of April and/or May 2006, Defendants shall
13 select a two to four week measurement period, depending on the category of service. Defendants
14 will conduct an analysis of the measurement period to determine a baseline in each of the four
15 service categories. During the months of August and/or September 2006, Defendants shall select
16 a two to four week measurement period, depending on the category of service. Defendants will
17 conduct an analysis of the measurement periods to demonstrate that 300 additional priority
18 classmembers received services in each of the four service categories over the baseline measure.
19 Defendants anticipate encounter data will be the major data source for the analysis; however, in
20 order to demonstrate that the goal is achieved, Defendants may utilize other data in addition to
21 the encounter data analysis findings. No facts or data generated after September 30 may be used
22 in calculating the measurement, except that encounters for services received by ADHS after
23 September 30, 2006 for services delivered before September 30, 2006, may be used in the
24 measurement process.

1 3 If unforeseen events beyond Defendants' control prevent it from providing
2 services to an additional 300 priority classmembers by September 30, Defendants may ask the
3 Court Monitor for a reasonable extension of time not to exceed 60 days from September 30. If
4 the Court Monitor grants Defendants' request, the new date shall be the date of completion.

5 4. Defendants shall complete the analysis as soon as possible, but no later than
6 December 29, 2006, in order to account for encounter lag time. When completed, Defendants
7 shall submit the analysis to the Court Monitor who will certify that Defendants either have or
8 have not fulfilled its obligation under this Stipulation. If fulfilled, Plaintiffs shall dismiss the
9 Motion for Noncompliance filed September 14, 2005. If not fulfilled, Plaintiffs may proceed
10 with their Motion for Noncompliance or pursue other relief.

11 DATED this 21st day of April 2006.

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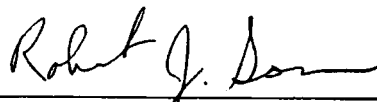
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12 ORIGINAL of the foregoing filed
13 this 21st day of April, 2006 with:

14 Clerk of the Court
15 Maricopa County Superior Court
16 201 W. Jefferson, Suite 4A
17 Phoenix, Arizona 85003

18 COPY of the foregoing hand-delivered
19 this 21st day of April, 2006 to:

20 Honorable Karen L. O'Connor
21 Presiding Probate Judge
22 Maricopa County Superior Court
23 125 W. Washington Street, Suite 102
24 Phoenix, Arizona 85003

25 COPY of the foregoing mailed
this 21st day of April, 2006 to:

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